

Colchester Borough Council

Equality Impact Assessment Form – An Analysis of the Effects on Equality

Section 1: Initial Equality Impact Assessment

Name of policy to be assessed:

- **Managing Customer Experience (MCE) Programme**

NB: 'Policy' is meant broadly to mean policy, strategy, service, function, activity or decision.

1. What is the main purpose of the policy?

Managing Customer Experience is the mode of implementing some of the key aims of the Council's Universal Customer Contact (UCC) strategic change programme. The Business Case for this fundamental review of customer contact was approved in November 2012 and articulates the organisation's ambition of introducing methods of customer interaction that:

- improves the council's overall efficiency and effectiveness;
- allows the customer to interact with the council using their preferred channel; and
- where appropriate, uses technology to deliver the solution.

Ultimately our aim is to provide our customers with the tools that will enable them to "self-service" and manage their dealings with us in timely and suitable ways. The MCE programme will consider a range of options that address how we can improve the transaction experience and focus on the greatest needs of our customers, and will arrive at a decision based on the wide range of data and customer insight available to us. This approach will respond to current trends in customer behaviour and their expectations regarding convenience and accessibility, which indicate that our services need to be delivered differently in the future.

Our vision for the MCE is:

- For service excellence to be determined by our customers.
- To enable positive behaviour change amongst our staff and customers, leading to a reduction in demand on Council resources.
- To empower our customers to use self-service when and where it is appropriate.
- Improved service delivery that helps customers and avoids waste.
- High standards of complex case management for our most vulnerable customers in a face to face environment.
- Make life simple for our customers through more effective and efficient journeys.

2. What main areas or activities does it cover?

- CBC Website – www.colchester.gov.uk
- Telephone contact
- Email contact
- In-person contact
- Letters
- Self-service
- Access to council information available in other outlets
- New media channels

3. Are there changes to an existing policy being considered in this assessment? If so what are they?

The key principle of the MCE programme is to change how we deliver our services to improve the ways people interact with us. This means that all customer-facing services will be affected by the MCE programme to a greater or lesser extent and will also encourage and support behaviour change.

This EQIA will build upon the [Customer Contact](#) assessment completed for the original UCC FSR business case, the previous EQIA for the [Council's Website](#) and the EQIA for [Channel Migrations](#).

Currently the MCE programme is focusing on the following areas:

- Delivering a new Customer Relationship Management (CRM) system
- Our new website
- Forms
- Process improvement
- Telephony
- Requirements for customers to provide evidence during their transactions

This EQIA was revisited in the light of the Council's Digital Challenge business case and joint work on the Customer Enterprise Programme when those were considered by Councillors in early 2016. Both of those build on the work that resulted from the original UCC FSR business case and the vision/key principle/outcomes for the MCE programme. The 'refreshed' EQIA for MCE now incorporates Digital Challenge and the Customer Enterprise Programme.

4. Who are the main audience, users or customers who will be affected by the policy?

- Any customer of the Council
- CBC Employees
- CBC Members
- Visitors to the borough
- Businesses in the borough.

5. What outcomes do you want to achieve from the policy?

- Improved customer service and satisfaction levels and experience, increasing the resolution rate at first point of contact and 24-hour access to information.
- We will offer our customers the opportunity to interact with us in a way that encourages self-sufficiency, autonomy and empowerment for the customer, but ensures access to expertise when the need arises. Our customers will be able to make bookings, payments, applications and requests for services easily and quickly.
- Effective and efficient processes that provide the customer with the information/service they need as well as making the most effective use of Council resources and finances.
- Ensuring that everyone can access the services they require in a way that is flexible and fair in light of their personal circumstances, and offers choice to the customer. This will include identifying and engaging with 'harder to reach' demographics and customer groups.
- Ensuring that all channels are fit for purpose, have access to the same information to accommodate 'channel hopping' and that online access is as user-friendly and intuitive as possible.
- Effective monitoring of customer access to services to achieve continuous improvement.
- Reflect the broader changes in how information is handled, from data protection legislation to cultural/social changes towards personalisation; and towards the individual, rather than the household. Liaison with external agencies may be required to achieve this.

6. Are other service areas or partner agencies involved in delivery? If so, please give details below:

- All Services – Customer, Professional, Operational, Community, Commercial, Corporate
- Colchester Borough Homes
- Essex Libraries – extending self-service access across the borough
- Essex County Council
- Essex Police
- University of Essex
- Essex County Fire and Rescue Service
- NHS
- Department for Work and Pensions
- Colchester Community and Voluntary Sector
- Colchester Mind
- Citizens Advice
- Town and Parish Councils

7. Are you aware of any relevant information, data, surveys or consultations¹ which help us to assess the likely or actual impact of the policy upon customers or staff?

- Considerable research was undertaken and data produced for the UCC Business Case mentioned in section 1 that is being used to inform the MCE programme.
- Similarly, information and data generated during previous Fundamental Service Reviews relating to customer transactions, expectations and behaviour will help to inform us of the impact of these proposed changes.
- The Council's Demand and Research team are part of the MCE Programme Board and supply ongoing information about behaviour change, website usage analysis and other relevant data.
- 2011 Census for the Colchester Borough.
- Society of Information Technology Management (SOCITM) data on customer contact through digital channels.
- In 2011 the Customer Service Centre commissioned a public survey on how customers access council services. See <http://www.colchester.gov.uk/article/5867/Accessing-Council-Services-Survey>
- Responses we used to support the Council's Customer Excellence programme and provide an insight into how the future provision of customer service could be delivered.
- Customer Insight intelligence like telephone call data, mystery shopping and customer feedback were used to identify areas of improvement within the Council and work to eliminate process failure and unnecessary cost to the customer.
- All self-service forms have been reviewed and are being rebuilt as part of the move to the new solution and feedback from a range of third sector organisations has been used to establish some key design principles to encourage consistency across CBC forms.

8. The 'general duty' states that we must have "due regard" to the need to:

- (a) eliminate unlawful discrimination, harassment and victimisation.
- (b) advance equality of opportunity between people who share a 'protected characteristic'² and those who do not?³
- (c) foster good relations between people who share a protected characteristic and those who do not?⁴

¹Click on [surveys or consultations](#) for more information. The Council's surveys and consultations include 'equality monitoring information' to help us identify any particular concerns or views expressed by any particular group or 'protected characteristic'. It can also help us to assess how representative of our customers the respondent group is. Local Data on the Protected Characteristics is available [on this page](#) of the Hub.

² The Equality Act's 'protected characteristics' include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief and sex and sexual orientation. It also covers marriage and civil partnerships, but not for all aspects of the duty.

³ This involves having due regard, in particular, to the need to: (a) remove or minimise disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it, and (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

⁴ This involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding.

Not all policies help us to meet the 'general duty', but most do. Where applicable, explain how this policy helps us to meet the 'general duty':

The policy helps us to 'eliminate unlawful discrimination, harassment and victimisation' in the following way(s):

- Whilst the MCE programme is not specifically focused on the elimination of unlawful discrimination, harassment and victimisation, the Council will always aim to provide services to our customers that are as inclusive and non-discriminatory as possible. Consideration will continue to be given to the terms of the Equality Act and we will ensure that all our processes are always compliant through robust monitoring and positive actions. By providing better and alternative ways of engaging with the Council we are improving the accessibility of services to each individual. This approach will be monitored and measured to ensure these objectives are met.

The policy helps us to 'advance equality of opportunity...' in the following way(s):

- One of the key aims of the MCE programme is to ensure that our services and resources are focused on dealing with the greatest needs of our customers. All customers will be treated equally as well as in a way that proactively responds to their individual circumstances. Where required, any customer will be supported in the accessing of the services they require. Our data will continue to inform us of how we can ensure our customers receive the excellent standards of service they should expect from us.

The policy helps us to 'foster good relations...' in the following way(s):

- As the MCE programme affects all services across the Council and also seeks to improve the opportunities for working with diverse external partner organisations, this approach should actively encourage good relations with all parties. This is particularly relevant in terms of the work we are doing to promote self-service in a range of community outlets across the borough, which should bring different customer groups together and provide an environment that enables them to support and learn from one another.

9. This section helps us to identify any disproportionate impacts. Please indicate in the table below whether the policy is likely to particularly benefit or disadvantage any of the 'protected characteristics'.

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Age	Older people (60+)	✓	<p>Self-service could benefit this group because Council services can potentially be accessed anywhere. Many people in this group will benefit from home online or mobile access rather than needing to travel to a Council office.</p> <p>Out of hours services are also available, such as 24-hour payment line, benefit and council tax benefit application forms.</p> <p>Self-service enables greater variety and choice of different ways to access Council services. Different IT platforms may particularly benefit younger people who increasingly value self-service, tailored services delivered, for example, by text alert or message.</p>	✓	<p>There may be a perception that, as customers are encouraged to use self-service, older people could be unfairly disadvantaged due to difficulty accessing/using computers due to technological barriers.</p>
	Younger people (17-25) and children (0-16)				

‘Protected characteristic’ group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Disability	Physical	✓	<p>Self-service could benefit this group because Council services can potentially be accessed anywhere at any time, using software, kit or preferences that suit individual needs. Many people in this group will benefit from home-based online or mobile access or, alternatively, by assisted self-service by a member of staff, or by advocate/family member/friend.</p> <p>For customers with sensory impairments or learning difficulties, specialist software and features such as Browsealoud, which reads the content aloud, offers larger font sizes and can make changes to the font and background colours, are available on the Council’s website. This can improve access by addressing potential barriers, and customising the online experience to meet individual preferences, eg for customers with literacy issues. Assisted self-service will also be available</p> <p>The future development of live web chat facilities and video conferencing as an alternative to telephone, post and emails channels could improve access for those with hearing impairment. Browse-Aloud as well as Braille and Audio-CD formats can also particularly benefit this group.</p>	✓	Some people with a disability may have difficulty accessing/using computers due to physical, sensory or communication barriers.
	Sensory				
	Learning				
	Mental health issues				
	Other – <i>specify</i>				

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Ethnicity ⁵	White			✓	Additional assistance may be required for customer groups unable to provide requested information or who rely on advocates acting on their behalf during transactions via the self-service channel, eg resettlement of Ghurkhas.
	Black				
	Chinese				
	Mixed Ethnic Origin				
	Gypsies/Travellers				
	Other – <i>please state</i>				
Language	English not first language	✓	Through the website customers are signposted to two free and instant online translation tools that they may use to access our services and in the completion of forms. When appropriate, the Council also uses the Language Line translation service when responding to customer enquiries and in more complex cases.	✓	Some groups are less likely to have English as a first language so may need additional assistance in accessing the translation services available to them.
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks	✓	Self-service could benefit this group because Council services can potentially be accessed anywhere. This group could particularly benefit from home online or mobile access, rather than needing to travel to a Council office.		
Religion or Belief	People with a religious belief (or none)				
Sex	Men				
	Women				
Gender Reassignment ⁶	Transgender/ Transsexual				

⁵ National Census 2011 categories are: Bangladeshi, Indian, Pakistani, Other Asian (Asian or Asian British), African, Caribbean, Other Black (Black or Black British), White and Black African, White and Asian, White and Black Caribbean (Mixed), British, Irish, Other White (White), Chinese, Other (Other Ethnic Group).

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Sexual Orientation	Bisexual, Heterosexual, Gay or Lesbian				
Marriage and Civil Partnership	People who are married or in a civil partnership				

10. If you have identified any negative impacts (above) how can they be minimised or removed?

Generally, there are significant advantages of self-service including greater convenience and lower costs associated with not having to travel into town.

For those customers who are unable to access self-service on their own, there are different means and levels of support available. This has been the case in the past and will continue. Telephony and in-person channels will still be available for those who still need individual support. In-person channels will be provided in a variety of locations as well as assisted self-service.

Continuous improvement in self-service should allow a greater proportion of customers to use this facility without assistance. Part of this will be due to individuals becoming more familiar with online access in general – for example at a national level, car tax applications, and locally, Gateway to Homechoice and e-benefit claims. 'Drop-down' options and automatic part-completion of forms can be part of this improvement, which also helps people who may have literacy and numeracy issues. As a greater proportion of customers use self-service options, this should free up resources for customers who need individual assistance through alternative or assisted channels.

The Council works with a range of local community groups who are involved in and consulted on the delivery of our services. In relation to this Impact Assessment these groups include: Colchester Community Voluntary Services (CCVS), Citizens Advice, Colchester Mind, Age UK, the Older People's Forum, The Youth Enquiry Service, YMCA, Fair Access to Colchester, TACMEP, North East Essex Faiths Forum, Colchester and Tendring Women's Refuge, and Outhouse East.

⁶ The protected characteristic of gender reassignment is defined by the Equality Act 2010 as “a person proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.” This is a personal process that may involve medical interventions such as counselling, psychotherapy, hormone therapy or surgery, but does not have to. NB: It is generally held that transgender people disguise their features or clothing to resemble their preferred sex, whereas transsexual people wish to change their body to completely resemble their preferred sex.

The Council has a proactive approach to improving access to digital and online services. The Council's website now has a range of resources available to customers, summarised on this webpage <http://www.colchester.gov.uk/go-online>

This include local support, tips, one to one support, online drop-in sessions at venues across the borough, digital skills for life course, community champions, go online advisors, and online accounts. These help to minimise or remove any negative impacts, and help to support all customers to embrace digital options and to access 21st century technological advances.

- ***Older people – There may be a perception that, as customers are encouraged to use ‘self-service’ (web-based access to Council services), this group could be disadvantaged”.***

Whilst it is generally perceived that older people are less likely to use IT in their daily routines, [recent research](#) indicates that this group do in fact want to learn how to utilise modern technology to help improve the quality of their lives. The research has found that older people recognise the benefits and convenience devices such as smart or mobile phones, tablets and computers offer and this group are keen to find ways that enable them to continue doing the things that are important to them and meet their needs.

The main requirement for this age group is that the technology is easy to use, which is a principle that should be applied across all age ranges and is something that the MCE Programme is keen to adhere to. The research also suggests that there is generally a lack of awareness about what is available and how to access it so the implementation of the self-service technology will need to include clear guidance on functionality and accessibility. We will also continue to engage with community and support groups, such as Age UK, to ensure that our customers have the information they need to get the most from our services.

- ***“Disability – Some people may find that their disability prevents them from accessing IT systems”.***

Many people with disabilities have found IT systems to be very helpful, as specialist software enables the user to customise their online experience to their individual needs, for example font size, colour, or a physical adaptation. Much of this software is now available for free, following customer demand and significant improvements in IT.

We will work closely with our customers and their representative groups to ensure that we understand their requirements, that advice and support is available to those that need it, and in formats that are suitable to their circumstances. We will also liaise with our IT suppliers to ensure that our systems are as accessible and legally compliant as possible. Whilst we will be encouraging self-service where this is possible, face-to-face transactions will still be an option for customers who need this channel.

Introducing design principles for our self-service forms will also assist customers. For example, the use of icons/imagery, where applicable, will help to engage customers visually as well as offer accessibility to all. Similarly, the use of clear, “everyday” language and limiting the use of local authority jargon will encourage greater take up of this service. The forms will continue to be periodically reviewed to ensure they are fit for purpose. A testing process has been agreed where service users of partner organisations will test the forms and provide us with feedback. This will ensure that ongoing improvements are made from the customer’s perspective.

- ***“Ethnicity/Language – Additional assistance may be required for customer groups unable to provide requested information or who rely on advocates acting on their behalf during transactions via the self-service channel.”***

From our ongoing community engagement activities we have a strong awareness of the type of difficulties customers whose first language is not English often face when trying to access public services. For example, a customer may need to use an English-speaking advocate when they make an application for Housing Benefit due to their own literacy or language limitations.

We are keen to ensure that the proposed changes to the way we are encouraging our customers to interact with us do not unfairly restrict access to our services for people within our diverse communities. According to the 2011 Census, 7.6% of the borough population classed themselves as “Black Minority Ethnic” (BME) and 3.3% of the total households figure recorded that English was not their main language. Colchester is the third most ethnically diverse area in Essex and has become more so in the last 10+ years. As part of the implementation of this programme, where it is available customer data relating to ethnicity and language will be used to help inform us of the measures we need to either reinforce or put in place to ensure equality of access to our services.

Customers currently have the ability to translate the content of our website into a range of other languages and we also offer access to a telephone-based translation service. We will continue to ensure that all frontline staff are trained how to use these services and that they are promoted to our customers. Similarly, we will review the content of our website on an ongoing basis and ensure that the information provided is easy for all our customers to understand.

A general point to note in relation to the headings above is that the Council’s website includes a Site Improve tool, which is an Accessibility module that automatically checks and reports website accessibility issues against the industry standard Web Content Accessibility Guidelines (WCAG2.0).

11. Could the policy discriminate⁷ against any ‘protected characteristic’, either directly or indirectly⁸?

- No.

⁷ The Council has a general duty to ‘eliminate unlawful discrimination, harassment and victimisation’. Direct discrimination occurs when a person is treated less favourably than another in a comparable situation because of their ‘protected characteristic’ whether on grounds of age, disability, pregnancy and maternity, ethnicity; religion or belief; sex (gender), sexual orientation, or marriage and civil partnership. Indirect discrimination occurs when an apparently neutral provision or practice would nevertheless disadvantage people on the grounds of their ‘protected characteristic’.

⁸ If you answer ‘yes’ to question 11 (above) you will need to complete this section *and* go on to complete Section 2 in order to conduct a full Equality Impact Assessment.

Summary and findings of Initial Equality Impact Assessment

12. Please put a tick in the relevant box to confirm your findings, and what the next step is:

Findings	Action required
No negative impacts have been identified	Sign off screening and finish.
Negative impacts have been identified but have been minimised or removed ✓	Sign off screening and finish.
Negative impacts could not be minimised or removed	Sign off screening and complete a full impact assessment – Section 2.
There is insufficient evidence to make a judgement.	Sign off screening and complete a full impact assessment – Section 2.

13. Name and job title of person completing this form:

- On behalf of the MCE Programme Board:

Prepared By: Louise Denyer – Implementation Project Officer, Enterprise Programme Management Office (EPMO)

Approved By: Pam Donnelly – Executive Director, Customer and Partnerships

14. Date of completion:

- December 2014. Updated January 2016 to incorporate Digital Challenge and Customer Enterprise Programme developments which build on the MCE programme

15. Date for update or review of this screening:

- January 2019 or earlier if legislative or other such changes require it.

EQIAs for the individual elements will be undertaken, where relevant, on a 3-year basis, as per the corporate procedure.